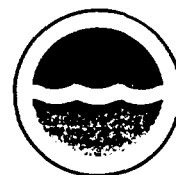


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Patterson Schafer, Incorporated



Environmental
Consultants

February 22, 1989

Mr. Donald R. Schregardus
Chief, Compliance Section (5WQC-TUB-8)
United States Environmental
Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

RE: Cerro Copper Products Company
Docket No. V-W-88-AO-01

Dear Sir:

This letter is in response to your January 31, 1989 letter to Mr. Paul Tandler. The attached revised Exhibits A, B, and C are to replace the ones from the periodic compliance report (PCR) submitted to U.S. EPA on January 13, 1989, by Patterson Schafer, Inc.

The limitations shown are the monthly average limits given in Mr. Sutfin's letter of November 10, 1988, but the corrected value for the monthly average limit of chromium at the East Outfall is 0.131 pounds per day, as Mr. Sutfin agreed in his January 25, 1989 letter to Mr. Tandler.

The plant effluent data shown in the corrected Exhibits are in "pounds per day" excepting the pretreated effluent from Metal Molding and Casting, which reflects a batch containing wastewater from two days of plant operation. Because that effluent data represents two days of operation, and the monthly average limitations are stated in pounds per day, we feel the reportable effluent value for MMC should be one half the batch value. We would appreciate your response, and note that Mr. Sutfin's letter of December 21, 1988, appears to support this approach. In that letter, on page 3, it says:

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Mr. Donald R. Schregardus
February 22, 1989
Page 2

2) The average of all the batch discharges sampled during the month must meet the monthly average limit (based on lbs/day, not lbs/batch).

Please call if there are any questions.

Cordially,



Carl J. Schafer

CJS/mh
880060.1

Attachments:

cc: Paul Tandler ✓
Cerro Copper Products, C..

Richard Kissel
Gardner, Carton and Douglas

George Schillinger
Village of Sauget

Kenneth Rogers
IEPA Compliance Assurance Section

C06317

EXHIBIT A
(Revised)

PCR DATA-CERRO/SAUGET
OCTOBER 25-26, 1988

	<u>Metal Molding & Casting (9A)</u>		<u>Secondary Copper (8A)</u>		<u>Copper Forming</u>			
					<u>Piercing (3B)</u>		<u>Extrusion</u>	
	<u>Actual</u>	<u>Limit</u>	<u>Actual</u>	<u>Limit</u>	<u>Actual</u>	<u>Limit</u>	<u>Actual</u>	<u>Limit</u>
Cu	111.55	0.825	206.37	0	0.11	0.178	190.34	0.734
Pb	6.20	0.512	30.52	0	0.02	0.023	0.	0.093
Zn	10.53	0.57	141.88	0	0.03	0.108	80.89	0.447
Phen	0.012	0.029	0.12	0	NR		NR	
TTO	0.0	0.074	0.0	0	0.34	0.060	0.03	0.249
O&G	1.86	0.978	10.96	0	1.17	2.134	721.43	8.814
Cr		NR	0.64	0	0.02	0.032	0.46	0.131(+)
Ni		NR	167.68	0	0.01	0.226	198.52	0.932
Prod.	406,113		406,087		0		875,000	

Notes:

Limitations are monthly average limits (lb/d), in lieu of daily maximum limits, based on historical production figures per Mr. Sutfin's letter of November 10, 1988 and January 25, 1989, (as amended by his letter of December 21, 1988 for Metal Molding and Casting). Cerro does not, by this reporting, waive and does hereby respectfully reserve its right to assert that the daily maximum limit is applicable where sampling is conducted once per month.

NR = Not regulated for this category.

Phen = Total phenols (4 AAP)

(+) = Monthly Average Limit of Chromium per Mr. Sutfin's letter of January 25, 1989.

EXHIBIT B
(Revised)

PCR DATA-CERRO/SAUGET
NOVEMBER 22-23, 1988

	<u>Metal Molding & Casting *</u>		<u>Secondary Copper (8A)</u>		<u>Copper Forming</u>			
	<u>Actual</u>	<u>Limit</u>	<u>Actual</u>	<u>Limit</u>	<u>Piercing (3B)</u>		<u>Extrusion</u>	
					<u>Actual</u>	<u>Limit</u>	<u>Actual</u>	<u>Limit</u>
Cu	0.025	0.825	56.17	0	0.11	0.178	28.59	0.734
Pb	0.010	0.512	13.22	0	0.02	0.023	4.99	0.093
Zn	0.0	0.570	62.77	0	0.04	0.108	47.11	0.447
Phen	-	0.028	0.01	0	NR		NR	
TTO	0.0	0.074	0.0	0	0.20	0.060	0.10	0.249
O&G	-	0.978	38.54	0	1.81	2.134	250.28	8.814
Cr		NR	0.24	0	0.06	0.032	0.26	0.131(+)
Ni		NR	63.87	0	0.01	0.226	46.01	0.932
Prod.	1,241,833		426,998		0		857,000	

Notes:

Limitations are monthly average limits (lb/d), in lieu of daily maximum limits, based on historical production figures per Mr. Sutfin's letter of November 10, 1988 and January 25, 1989, (as amended by his letter of December 21, 1988 for Metal Molding and Casting). Cerro does not, by this reporting, waive and does hereby respectfully reserve its right to assert that the daily maximum limit is applicable where sampling is conducted once per month.

NR = Not regulated for this category

Phen = Total phenols (4 AAP)

- * The Sverdrup data indicates sample #6 is for the pretreatment plant. However, this sample was obtained from the treatment tank itself, rather than from the treated effluent. Hence these values are not representative of a batch discharge. The values shown are from tabulated plant laboratory data taken during batch discharges. (Attachment A)

Analyses for total phenols and oil and grease are not routinely performed in the plant.

(+) Monthly average limit of chromium at the East Outfall per Mr. Sutfin's letter of January 25, 1989.

EXHIBIT C
(Revised)

PCR DATA-CERRO/SAUGET
DECEMBER 6-7, 1988

<u>Metal Molding & Casting</u>			<u>Secondary Copper (8A)</u>		<u>Copper Forming</u>			
					<u>Piercing (3B)</u>		<u>Extrusion</u>	
<u>Actual</u>	<u>Limit</u>		<u>Actual</u>	<u>Limit</u>	<u>Actual</u>	<u>Limit</u>	<u>Actual</u>	<u>Limit</u>
Cu	0.026	0.825	167.61	0	0.10	0.178	130.03	0.734
Pb	0.021	0.512	63.25	0	0.0	0.023	0.0	0.093
Zn	0.004	0.57	112.12	0	0.02	0.108	136.86	0.447
Phen	0.001	0.029	.023	0		NR		NR
TTO	*	0.074	*	0	*	0.060	*	0.249
O&G	1.20	0.978	64.61	0	9.18	2.134	119.66	8.814
Cr		NR	0.49	0	0.01	0.032	0.28	0.131(+)
Ni		NR	9.93	0	0.0	0.226	51.60	0.932
Prod. 940,212			427,103		0		969,000	

Notes:

Limitations are monthly average limits (lb/d), in lieu of daily maximum limits, based on historical production figures per Mr. Sutfin's letter of November 10, 1988 and January 25, 1989, (as amended by his letter of December 21, 1988 for Metal Molding and Casting). Cerro does not, by this reporting, waive and does hereby respectfully reserve its right to assert that the daily maximum limit is applicable where sampling is conducted once per month.

NR = Not regulated for this category

Phen = Total phenols (4 AAP)

* To be reported in next quarterly report, per Mr. Sutfin's letter of September 15, 1988.

(+) Monthly Average Limit of Chromium per Mr. Sutfin's letter of January 25, 1989.